

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

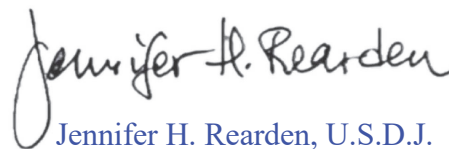
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March 21, 2023

**Via ECF**

Honorable Judge Jennifer H. Rearden  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Date: March 22, 2023

Re: Perez v. City of New York, et al.  
Civil Action No.: 20 Civ. 6615 (JHR)  
Law Manager No.: 2020-035157

Dear Judge Rearden:

I am the Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent Defendants the City of New York and Benne McCants (collectively, the "City Defendants"), in the above-referenced action. The City Defendants write to seek an extension of time to file their reply from March 24, 2023, to April 10, 2023. This is the second request for an extension of time to serve their reply and Plaintiff consents to this request.

Under the current schedule, the City Defendants have until March 24, 2023, to serve their reply. See ECF. No. 78. On January 30, 2023, Plaintiff served her 33-page memorandum of law in opposition to the City Defendants' motion as well as a 39-page response to the City Defendants' 56.1 statement with 247 additional paragraphs in her Rule 56.1 statement of material facts. Due to Plaintiff's voluminous response, the City Defendants are seeking this additional time in order to finalize their reply. Defendants are also seeking this additional time because of workload issues, owing to the undersigned's high volume of other employment-related matters in federal and state court. Accordingly, City Defendants are seeking an extension of time to file their reply on April 10, 2023.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

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John F. Walpole  
Assistant Corporation Counsel

cc: All counsel of record (via ECF)